

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

C.O.,

Plaintiff,

v.

Case No. 7:21-cv-92-HL

United States of America,

Defendant.

STATUS UPDATE

Plaintiff C.O. and Defendant United States of America have previously moved the Court to stay proceedings pending early discussions between the parties regarding informal resolution of the case outside of litigation. Specifically, the parties moved to stay the case in October 2021 and the case has been stayed since then as the parties negotiate possible resolution. Since the last order was entered staying the case (ECF No. 42), the parties have continued to negotiate in good faith. There have been offers and counteroffers exchanged, and the parties have communicated both in writing and on the telephone regarding their positions. The parties agree that progress is being made towards settlement.

Because of the progress that has already occurred and is expected to continue, the parties respectfully request that the Court allow the case to remain stayed for an additional 30 days. No further extensions are anticipated beyond this 30-day period. If the Court has questions regarding the progress being made, the parties respectfully suggest a telephone status conference that would allow the parties to explain the current posture of negotiations.

Respectfully submitted this 10th day of May, 2022.

**MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND**

/s/ Leticia Saucedo

Leticia Saucedo (TX Bar No. 797381)*

Juan Rodriguez (CA Bar No. 282081)*

634 S. Spring St., 11th Floor

Los Angeles, CA 90014

Telephone: (213) 629-2512

lsaucedo@maldef.org

jrodriguez@maldef.org

Rosa Saavedra Vanacore (NY Bar No. 5625611)*

1016 16th St., NW, Ste. 100

Washington, DC 20036

Telephone: (202) 293-2828

rsaavedra@maldef.org

ESHMAN BEGNAUD, LLC

Mark Begnaud

Georgia Bar No. 217641

mbegnaud@eshmanbegnaud.com

Michael J. Eshman

Georgia Bar No. 365497

meshman@eshmanbegnaud.com

315 W. Ponce De Leon Ave., Suite 775

Decatur, GA 30030

Telephone: (404) 491-0170

*Admitted *pro hac vice*

Attorneys for Plaintiff C.O.

**PETER D. LEARY
UNITED STATES ATTORNEY**

/s/ E. Bowen Reichert Shoemaker

E. BOWEN REICHERT SHOEMAKER

Assistant United States Attorney

Georgia Bar No. 222443

bowen.shoemaker@usdoj.gov

AMELIA G. HELMICK

Assistant United States Attorney
Georgia Bar No. 142673
amy.helmick@usdoj.gov
U.S. Attorney's Office Middle District of Georgia
P.O. Box 1702
Macon, Georgia 31202
Phone: (478) 752-3511

Attorneys for Defendant United States of America